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October 2, 2018

VIA ECF

The Honorable Steven C. Mannion United States Magistrate Judge United States District Court District of New Jersey Martin Luther King Building & U.S. Courthouse 50 Walnut Street Room 4015 Newark, NJ 07101

RE: White, et al. v. Samsung Electronics America, Inc., et al., U.S.D.C., D.N.J., No. 2:17-cv-01775-MCA-SCM

Dear Magistrate Judge Mannion:

We are counsel for Defendant Samsung Electronics America, Inc. in this matter. We submit this brief agenda letter on behalf of all parties in advance of the Telephone Status Conference scheduled for October 4, 2018 at 4:15 p.m. Eastern Time.

As Your Honor may be aware, on September 26, 2018, Judge Arleo issued a letter order (Dkt. No. 82) granting Defendants' Motion to Dismiss (Dkt. No. 54) in its entirety. A copy of that letter order is attached. Pursuant to stipulation of the parties (Dkt. No. 70-1), this Court previously ordered "that all discovery in this matter shall be stayed pending further order of the Court after a decision ruling on Defendants' motion to dismiss" (Dkt. No. 72).

Counsel for Plaintiffs states that he will be seeking to amend the Complaint to, amongst other things, add a proposed New Jersey representative Plaintiff, as he has previously referenced.

As directed by the Court (Dkt. No. 80), counsel for Samsung counsel will initiate the call for the Telephone Status Conference on October 4, unless the Court directs otherwise.

We thank the Court for its consideration of this submission.

Respectfully submitted,

s/ Michael R. McDonald

Michael R. McDonald

cc: All Counsel of Record (via ECF)